

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION**

GWENEVERE J. BENNETT,

Plaintiff,

v.

5:18-cv-00145-RWS

CBE COMPANIES, INC.

d/b/a THE CBE GROUP,

Defendant.

**JOINT MOTION TO ENTER PROPOSED DISCOVERY ORDER**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiff Gwenevere J. Bennett and Defendant CBE Companies, Inc., d/b/a The CBE Group (joint “the Parties”), and files this Joint Motion to Enter Discovery Order, and will show onto this Court as follows:

**I.**

1. Pursuant the Court’s February 7, 2019 Order, the Parties were required to submit a joint Proposed Discovery Order. Doc. 8.
2. Attached hereto this Joint Motion is a Proposed Discovery Order based on the Court’s sample order. The Content of the Proposed Discovery Order has been agreed to by the Parties.
3. The Parties apologize for the issues the Parties have had in timely and properly filing said Proposed Discovery Order in accordance with the Court’s requires and the local rules of the Eastern District of Texas.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Gwenevere J. Bennett and Defendant CBE Companies, Inc., d/b/a The CBE Group respectfully request that this Court enter the attached Proposed Docket Control Order.

Agreed as to form and content, and respectfully submitted:

/s/ Nathan C. Volheim

Nathan C. Volheim, Esq. #6302103  
*Counsel for Plaintiff*  
Admitted in the Eastern District of Texas  
Sulaiman Law Group, Ltd.  
2500 South Highland Ave., Suite 200  
Lombard, Illinois 60148  
(630) 568-3056 (phone)  
(630) 575-8188 (fax)  
nvolheim@sulaimanlaw.com

/s/ Robbie Malone

ROBBIE MALONE  
Texas State Bar No. 12876450  
Email: [rmalone@mamlaw.com](mailto:rmalone@mamlaw.com)  
EUGENE XERXES MARTIN, IV  
Texas State Bar No. 24078928  
Email: [xmartin@mamlaw.com](mailto:xmartin@mamlaw.com)  
JACOB MICHAEL BACH  
Texas State Bar No. 24100919  
Email: [jbach@mamlaw.com](mailto:jbach@mamlaw.com)  
**MALONE AND MARTIN PLLC**  
Northpark Central, Suite 1850  
8750 North Central Expressway  
Dallas, Texas 75231  
TEL: (214) 346-2630  
FAX: (214) 346-2631

***COUNSEL FOR DEFENDANT***

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been forwarded via CM/ECF on this 5th day of March, 2019 to all counsel of record in this case.

/s/ Robbie Malone

ROBBIE MALONE